

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

KATHLEEN BERSAW, :
Plaintiff, : Civil Action No. 1:14-CV-_____
v. :
NORTHLAND GROUP INC., :
Defendant. :

NOTICE OF REMOVAL

Defendant Northland Group Inc. ("Defendant"), by and through its attorneys, Preti, Flaherty, Beliveau & Pachios, PLLP pursuant to 28 U.S.C. §§ 1331, 1441, and 15 U.S.C. §§ 1681, *et seq*, Fed. R. Civ. P. 81(c) and Local Rule 81.1, and hereby removes the action captioned *Kathleen Bersaw v. Northland Group Inc.*, Docket No. 449-14-SC-163, now pending in the New Hampshire District Court, Cheshire County, Keene 8th Circuit District Court, Small Claims Division, to the United States District Court for the District of New Hampshire. In support of this removal, Defendants state as follows:

1. On or after July 7, 2014, Defendant was served with Plaintiff's Complaint, in an action entitled, *Kathleen Bersaw v. Northland Group Inc.*, filed of record with the Clerk of the Keene 8th Circuit Court, Cheshire County, New Hampshire, Case No: 449-14-SC-194. A copy of the Complaint is attached hereto as Exhibit A.
2. Plaintiff's Complaint purports to set forth a cause of action under 15 U.S.C. §§ 1681, *et seq.*, 15 U.S.C. § 1692k, and N.H. R.S.A. 359-B:18.

3. This Court has original jurisdiction over Plaintiff's cause of action based on 15 U.S.C. §§ 1681, *et seq.*, and 15 U.S.C. §§ 1692k as set forth in 28 U.S.C. § 1331, as Plaintiff has brought at least one claim under federal law. Pursuant to 28 U.S.C. § 1441, therefore, the civil action pending in the Keene 8th Circuit Court, Cheshire County, New Hampshire is removable to this Court.
4. Thirty (30) days have not yet expired since receipt of Plaintiff's Complaint.
5. Copies of all process, pleadings and orders served upon Defendant in this action are attached hereto.
6. Pursuant to 28 U.S.C. § 1446, a copy of this Notice of Removal is being filed with the New Hampshire District Court, Cheshire County, Keene 8th Circuit District Court, Small Claims Division and served upon Plaintiff.
7. Pursuant to Local Rule 81.1, Defendant will file certified or attested-to copies of all papers that have been filed in Small Claims Court.

WHEREFORE, Defendant prays that the above-captioned action now pending in the Keene 8th Circuit Court, Cheshire County, New Hampshire, be removed therefrom and placed on the regular docket of the United States District Court for the District of New Hampshire.

Respectfully submitted,

NORTHLAND GROUP INC.

By its attorneys,

PRETI, FLAHERTY, BELIVEAU & PACHIOS,
PLLP

Dated: July 31, 2014

/s/ Daniel R. Sonneborn

Kenneth E. Rubinstein, NH Bar # 14926

krubinstein@preti.com

Daniel R. Sonneborn, NH Bar # 20947

dsonneborn@preti.com

P.O. Box 1318

Concord, NH 03302-1318

(603) 410-1500

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2014 I served the foregoing Notice of Removal by regular U.S. First Class Mail, postage prepaid, to the following:

Kathleen Bersaw
Douglas Bersaw as her Attorney-in-fact
139 Tully Brook Road
Richmond, New Hampshire 03470

/s/ Daniel R. Sonneborn

Daniel R. Sonneborn, NH Bar # 20947